IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

PNC Bank, National Association, successor to National City Bank, Plaintiff, v. Glenn Udell; Pamela Udell; Sorrento Enterprises, LLC; Sorrento Enterprises, LLC – Series A; Sorrento Enterprises, LLC – Series B; Sorrento Enterprises, LLC – Series C; Sorrento Enterprises, LLC – Series D; Sorrento Enterprises, LLC – Series E; Sorrento Enterprises, LLC – Series F; Sorrento Enterprises, LLC – Series G; Sorrento Enterprises, LLC – Series H; Sorrento Enterprises, LLC – Series I; Sorrento Enterprises, LLC – Series J; Sorrento Enterprises, LLC – Series K; Sorrento Enterprises, LLC – Series L; Sorrento Enterprises, LLC – Series M; Sorrento Enterprises, LLC – Series N; Sorrento Enterprises, LLC – Series O; Sorrento Enterprises, LLC – Series P; Sorrento Enterprises, LLC – Series Q; Sorrento Enterprises, LLC – Series R; Sorrento Management, Inc. and Chicago Title Land Trust as trustee under trust agreement dated May 19, 2008 and known as trust number 8002350906, Defendants.	)	Case No. 16 CV 5400

JOINT MOTION TO STAY PROCEEDINGS FOR THIRTY DAYS IN AID OF SETTLEMENT NEGOTIATIONS

Plaintiff, PNC Bank, National Association, and Defendants, Glenn Udell, Pamela Udell, Sorrento Enterprises, LLC, Sorrento Enterprises, LLC – Series A-R, and Chicago Title Land Trust as trustee under trust agreement dated May 19, 2008 and known as trust number 8002350906 ("Defendants"), respectfully jointly move, by and through their attorneys, for entry of an Order staying proceedings in this matter, including any ruling on pending motions, for a period of 30 days, in aid of the parties' efforts to attempt a negotiated resolution of this matter. In support of this motion, the parties state as follows:

1. Plaintiff's First Amended Complaint was filed on January 5, 2017. (Doc. # 58.)

2. Defendants have a Motion for Summary Judgment pending against Counts I-IV of Plaintiff's First Amended Complaint. (Doc. # 43, 47, 48.) That motion is fully briefed.

3. Certain Defendants also have a pending Motion to Dismiss directed to Counts V-VII of Plaintiff's First Amended Complaint. (Doc. # 70.) That motion also is fully briefed.

4. The parties recently have been engaged in discussions directed toward a possible negotiated resolution of the disputes which are the subject of this action. Although the parties have not reached an agreement at this time, the parties believe it would be desirable, and serve judicial economy, to stay proceedings in this matter, including the issuance of any ruling on the pending Motion to Dismiss and Motion for Summary Judgment, for 30 days while the parties continue to explore the possibility of settlement.

6. This motion is made jointly by all parties in this action and not brought for the purpose of causing any undue delay.

7. The parties will undertake to advise the Court promptly of the outcome of their discussions should they be fruitful, and respectfully suggest that the Court consider setting a status date approximately thirty days hence at which time the parties can further advise the Court of the status of this matter.

WHEREFORE, Plaintiff and Defendants respectfully request that this Honorable Court grant this motion, and stay all proceedings in this matter, including issuance of any ruling on Defendants' pending Motion to Dismiss and Motion for Summary Judgment, for a period of thirty days, and for such other and further relief as the Court finds just and appropriate.

Dated: May 12, 2017

Respectfully submitted,

PNC Bank, National Association

By: *___/s/ Matthew L. Hendricksen___*

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Glenn Udell; Pamela Udell;
Sorrento Enterprises, LLC;
Sorrento Enterprises, LLC – Series A-R;
Sorrento Management, Inc.; and Chicago Title Land Trust as trustee under trust agreement dated May 19, 2008 and known as trust number 8002350906,

By: *___/s/ Andrew A. Jacobson___*

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